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- REMARKS -

A. Claims 1-20 were rejected as unpatentable over Applicants admitted prior art in view of Stewart

The §103(a) rejection of claims 1-20 is traversed.

In order to maintain the §103(a) rejection of claims 1-20, each and every element of the claimed invention must be taught or suggested by the reference in at least as great detail as claimed. Because the references alone or in combination fail to teach, at a minimum, "receiving broadcast information at the mobile vehicle, wherein the broadcast information comprises information location coordinate data" as claimed in claims 1, 9 and 17, and new claim 21, the 103(a) rejection must fall to those independent claims, as well as claims 2-8, 10-16 and 17-20 depending directly or indirectly from claims 1, 9 or 17 respectively.

Instead, the references teach a method "of providing geographically sensitive promotional information" that is selectively sent to the 'predefined' location. By contrast, the claimed invention requires that the broadcast information comprise information location coordinate data, and receiving the broadcast information at the mobile vehicle. Thus, in Stewart, the determination of which information will be broadcast is centralized, and each vehicle receives only the promotional information intended for that particular vehicle. However, in the claimed invention, the broadcast information is received at the mobile vehicle, and the broadcast information comprises information location coordinate data. In the claimed invention, based on the received broadcast, a determination is made whether the information location coordinate data resides within a convex hull, and the broadcast information is presented to the mobile vehicle user based on the determination. In Stewart, the determination of which promotional messages are to be displayed to a driver is determined *prior* to broadcast of the message, while in the claimed invention, the determination is made *in response to receiving* the broadcast information.

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Furthermore, the references alone or in combination fail to teach or suggest "determining whether the information location coordinate data resides within a convex hull" as claimed in claims 1, 9 and 17, and new claim 21, the 103(a) rejection must fall to those independent claims, as well as claims 2-8, 10-16 and 17-20 depending directly or indirectly from claims 1, 9 or 17 respectively.

The Examiner correctly recognizes that Applicant's Admitted Prior Art does not teach or suggest use of a convex hull, and relies upon Stewart for such a teaching. However, Stewart directly teaches away from the use of a convex hull in the teaching of a "predetermined location." *See*, Stewart, column 2, lines 58-67.

Those of ordinary skill in the art recognize that a customary definition of a "convex hull" is "For a set S in space, the smallest convex set containing S. In the plane, the convex hull can be visualized as the shape assumed by a rubber band that has been stretched around the set S and released to conform as closely as possible to S." *See*, e.g. the definition of "convex hull" at dictionary.com. Thus, use of a convex hull in the determination necessarily and unequivocally is not use of a "predetermined location." Instead, the metes and bounds of a convex hull are dynamically determined based on the set of locations.

Withdrawal of the rejections to claims 1-20 is requested for at least this additional reason.

B. New claim 21 is patentable over the prior art and references as the references, alone or in combination, fail to disclose or teach each and every claim element.

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SUMMARY

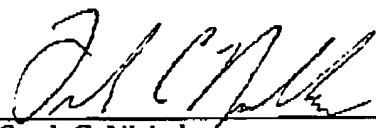
The Examiner's rejections of claims 1-20 have been obviated by remarks herein supporting an allowance of pending claims 1-21 over the art of record. The Applicants respectfully submit that claims 1-21 herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,
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